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***Attorneys for Defendant***  
**LEFRAK ORGANIZATION, INC.**

21 MC 102 (AKH)

IN RE: WORLD TRADE CENTER LOWER  
MANHATTAN DISASTER SITE LITIGATION

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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NAYIBE PADREDIN,

Plaintiff,

-against-

80 LAFAYETTE ASSOCIATES, LLC, B.R. FRIES &  
ASSOCIATES, INC., BATTERY PARK CITY  
AUTHORITY, BLUE MILLENNIUM REALTY LLC,  
CENTURY 21, INC., EMPIRE STATE PROPERTIES,  
INC., GRUBB & ELLIS MANAGEMENT  
SERVICES, HILLMAN ENVIRONMENTAL  
GROUP, LLC., HUDSON TOWERS HOUSING CO.,  
INC., LEFRAK ORGANIZATION, INC., MAYORE  
ESTATES LLC, MAYORE ESTATES LLC AND 80  
LAFAYETTE ASSOCIATION LLC AS TENANTS IN  
COMMON, and STONER AND COMPANY, INC.,

Defendants.

Case No.:  
07-CV-5306 (AKH)

**NOTICE OF ADOPTION  
OF ANSWER TO MASTER  
COMPLAINT OF LEFRAK  
ORGANIZATION, INC.**

**PLEASE TAKE NOTICE THAT** defendant, LEFRAK ORGANIZATION, INC., as  
and for its response to the allegations set forth in the Complaint by Adoption (Check-Off  
Complaint) Related to the Master Complaint filed in the above-referenced action, hereby adopts  
its Verified Master Answer dated July 30, 2007, which was filed in the matter of *In Re: World  
Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH). LEFRAK

ORGANIZATION, INC. has filed a Master Disclosure of Interested Parties in 21 MC 102 (AKH), and as such, is exempt from having to file such a disclosure in this specific matter, pursuant to the provisions of Case Management Order No. 4 (§ J(2)).

**WHEREFORE**, LEFRAK ORGANIZATION, INC. demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York  
September 10, 2007

Yours etc.,

**HARRIS BEACH PLLC**

A handwritten signature in dark ink, appearing to read 'BAB', is written over a horizontal line. The signature is stylized and cursive.

Brian A. Bender, Esq. (BAB-0218)

HARRIS BEACH PLLC

*Attorney for Defendant*

**LEFRAK ORGANIZATION, INC.**

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